

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAIME RAMON CASTANEDA
VALENZUELA,

Case No. 2:24-cv-01441-RSL

**STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND ORDER**

Plaintiff

V.

CONNIE NOLAN, *et al.*,

Defendants.

Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until January 17, 2025. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act, *inter alia*, to compel U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate his Form I-918 and Form I-765. Defendants’ response to the Complaint is currently due on November 18, 2024. The parties are currently working towards a resolution to this litigation. For good cause, the parties request that the Court hold the case in abeyance until January 17, 2025.

Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for

1 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.
 2 P. 1.

3 With additional time, this case may be resolved without the need of further judicial
 4 intervention. USCIS is in the process of reviewing Plaintiff’s applications. Once the
 5 applications are adjudicated, Plaintiff will dismiss the case. As additional time is necessary for
 6 this to occur, the parties request that the Court hold the case in abeyance until January 17, 2025.
 7 The parties will submit a status update on or before January 17, 2025.

8 DATED this 18th day of November, 2024.

9 Respectfully submitted,

10 TESSA M. GORMAN
 United States Attorney

11 s/ Michelle R. Lambert
 12 MICHELLE R. LAMBERT, NYS #4666657
 Assistant United States Attorney
 13 United States Attorney’s Office
 Western District of Washington
 14 1201 Pacific Avenue, Suite 700
 Tacoma, Washington 98402
 Phone: (253) 428-3824
 15 Fax: (253) 428-3826
 Email: michelle.lambert@usdoj.gov

16
 17 Attorneys for Defendants

18 I certify that this memorandum contains 250
 words, in compliance with the Local Civil Rules.
 19
 20
 21
 22
 23
 24

GLOBAL LAW ADVOCATES, PLLC

s/ Inna Scott
 INNA SCOTT, WSBA #46864
 655 South Orcas Street, Ste. 210
 Seattle, Washington 98108
 Phone: (206) 774-8758
 Email: iscott@globallawadvocates.com

Attorney for Plaintiff

ORDER

2 The case is held in abeyance until January 17, 2025. The parties shall submit a status
3 update on or before January 17, 2025. It is so **ORDERED**.

Dated this 19th day of November, 2024.

Robert S. Lasnik
Robert S. Lasnik
United States District Judge